



August 27, 2009

The Honorable Arne Duncan
U.S. Secretary of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Dear Secretary Duncan:

Thank you for the opportunity to comment on the notice of proposed priorities, requirements, definitions, and selection criteria for the Race to the Top Funds authorized by the American Recovery and Reinvestment Act of 2009 (ARRA). Collectively, the signatories below have many decades of experience in education research, with a particular focus on measuring student growth.

We strongly support the focus of the Race to the Top program on teacher effectiveness and achieving equity in the distribution of effective teachers. However, as researchers who have been working with administrative data from many different school districts and states, we urge the department to include some additional guidance to states in (1) defining a “teacher of record” in each tested grade and subject, (2) requiring verification and use of “teacher of record”, and (3) defining “student growth”. We believe that the current guidance does not provide enough specificity. Too many mistakes in these areas in the early years could undermine progress elsewhere.

In our experience, different districts and states have widely divergent standards and definitions when it comes to linking students to individual teachers. States should have plans for ensuring that the data are accurate and used by teachers. Without a common understanding of how those links are made, evaluations and accountability determinations may be skewed, and teacher confidence in the fairness and accuracy of the data may be undermined. Sufficiently specific common definitions for linking students to teachers are needed to ensure accuracy. We describe each recommendation in more detail below.

(1) Defining a “Teacher of Record”

We urge the department to include the following definition in “Section IV. Definitions”:

Teacher of record identifies the teacher or teachers who have responsibility for providing instruction to a given student since the most recent prior test administration in a given subject. In some circumstances, a student may have more than one “teacher of record”—for instance, if there is team teaching in a given subject or when another teacher provides supplemental instruction. For each of those students, the state should approximate the share of instructional responsibility since the prior state test administration to be apportioned to each teacher. The state should also track whether each of the “teachers of record” is a classroom instructor or



providing supplemental education in a subject, e.g. as a “pull-out”. The state should establish a “teacher of record” for each student in each tested subject from grades 3 through 8. For students in grades 9 through 12, the state should define a “teacher of record” in those subjects for which “end of course” tests are available. Teachers of record and their supervisors should be asked to verify and, where appropriate, correct the rosters of students for whom they have been assigned responsibility and they should do so at least twice per year.

(2) Verifying and using “Teacher of Record”

Teacher verification of class rosters is essential. In addition, under Reform Plan Criterion (B)(3) “Using data to improve instruction”, we would propose including a specific example in item (i). The proposed insertion is in italics:

- (i) Increase the use of instructional improvement systems (as defined in this notice) that provide teachers, principals, and administrators with the information they need to improve their instructional practices, decision-making, and overall effectiveness (*such as providing to teachers a report on growth on interim or summative assessments for each student for whom they are the designated teacher of record*).

Under Reform Plan Criterion (C)(2)(iii), we would propose the following insertion in italics:

- (ii) Granting tenure to and dismissing teachers and principals based on rigorous and transparent procedures for awarding tenure (where applicable) and for removing tenured and untenured teachers and principals after they have had ample opportunities to improve but have not done so. (*For instance, to ensure that student achievement is considered as part of tenure decisions, a state could ensure that student growth data are made available to the supervisors, principals and district leaders for probationary and untenured teachers being considered for tenure.*)

(3) Defining “Student Growth”

We would propose replacing the definition “Student Growth” in Section IV with the following:

Student Growth means the extent to which a student underperforms or outperforms on student achievement tests those with comparable prior achievement results. There are various statistical procedures for establishing the achievement levels of those with “comparable prior achievement levels”, such as multiple regression or mixed models. Such methods require at least one prior assessment of student achievement in a given subject, although the procedures an



be improved by allowing the incorporation of more than one prior assessment, including assessments in other subjects. (Although student growth would typically be calculated using state achievement tests, there may be other measures of student learning, such as interim or benchmark assessments or indicators of high school graduation or college going, which could be used for calculating student growth for individual teachers or whole schools.) A student whose performance exceeds that of other students with similar prior performance should be considered as achieving more than one year's worth of growth; a student who underperforms those with similar prior performance should be considered as achieving less than a year's worth of growth.

Thank you for your consideration of these comments. We believe they are critical to the successful implementation of the teacher effectiveness priorities in the Race to the Top competition. We share your desire to see these funds have maximum impact on improving the effectiveness of teaching and therefore the outcomes for all students.

Sincerely yours,

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